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20     Claim Holders*

21      **UNITED STATES BANKRUPTCY COURT  
22     NORTHERN DISTRICT OF CALIFORNIA  
23     SAN FRANCISCO DIVISION**

24     In re:

25     PG&E CORPORATION,

26     - and -

27     PACIFIC GAS AND ELECTRIC  
28     COMPANY,

29     Debtors.

30      Affects PG&E Corporation

31      Affects Pacific Gas and Electric Company

32      Affects both Debtors

33     *\*All papers shall be filed in the lead case, No.  
34     19-30088 (DM)*

35     Case No. 19-30088

36     Chapter 11

37     (Lead Case)

38     (Jointly Administered)

39     **AD HOC GROUP OF SUBROGATION  
40     CLAIM HOLDERS' LIST OF  
41     DISCOVERY REQUESTS**

42     Date: August 7, 2019

43     Time: 9:30 a.m. (Pacific Time)

44     Place: United States Bankruptcy Court  
45     Courtroom 17, 16th Floor  
46     San Francisco, CA 94102

1           In accordance with the Court's *Order re Telephone Discovery Conference*, dated July 29,  
2 2019, the Ad Hoc Group of Subrogation Claim Holders (the "Ad Hoc Subrogation Group")  
3 submits this list of discovery requests. This list consists of discovery related to pre-petition  
4 wildfires that the Ad Hoc Subrogation Group believes it needs on a priority basis in order to  
5 adjudicate the claims of its members in this Court, as the Debtors seek to do pursuant to the  
6 *Debtors' Motion Pursuant to 11 U.S.C. §§105(a) and 502(c) for the Establishment of Wildfire*  
7 *Claims Estimation Procedures* (Dkt. 3091). The Ad Hoc Subrogation Group has begun to meet  
8 and confer with the Debtors in an effort to agree upon a discovery protocol to address these  
9 categories of information, among others, and will continue to do so in advance of the August 7,  
10 2019 telephonic conference with the Court.<sup>1</sup> We understand that the Court has set limits  
11 regarding the scope of topics that it will consider at the August 7 telephonic conference, but the  
12 Ad Hoc Subrogation Group will be available to address issues related to these categories of  
13 information (and any others), in the event the parties cannot reach agreement prior to that time.

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- 15           • Non-destructive examination of PG&E equipment and other evidence collected in  
connection with 2017 and 2018 wildfires, including near any potential area(s) of origin.<sup>2</sup>
- 16           • Non-destructive examination of evidence in Cal Fire's possession and depositions of  
appropriate CalFire investigators and representatives
- 17           • Documents relating to PG&E's policies and practices regarding de-energizing power in  
certain weather conditions and vegetation management
- 18           • Depositions of PG&E representatives who were not deposed on relevant issues pre-  
petition
- 19           • Documents sent by PG&E to the CPUC regarding the Caribou-Palermo 115 KV  
transmission line (Camp Fire).

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<sup>1</sup> A complete list of open discovery requests was sent to the Debtors on July 1, 2019 related to all relevant wildfire litigation, and attached to the TCC's prior submission to the Court. The below list does not identify all of the discovery that may be necessary to adjudicate the Ad Hoc Subrogation Group's claims in this Court, but rather identifies the key categories of discovery that are requested on a priority basis. The Ad Hoc Subrogation Group reserves all rights to seek additional discovery at a later date.

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<sup>2</sup> In the Debtors motion, they submit that they will not contest causation for estimation purposes with respect to the 2018 Camp Fire or any of the 2017 North Bay Fires, except the 2017 Tubbs Fire. (Dkt. 3091 at 4.) This list assumes that the issue of causation with respect to these Fires is stipulated to.

- Documents regarding the Caribou-Palermo 115 KV transmission line 10 miles on either side of transmission tower 27/222 (Camp Fire).
- Documents concerning the tap line on Zink Hill, including vegetation management in or around the same (Tubbs Fire)
- Documents or information that support estimates or projections of wildfire claim amounts as set forth in public and court filings by the Debtors

Dated: August 1, 2019

WILLKIE FARR & GALLAGHER LLP

*/s/ Benjamin P. McCallen*  
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